

**Savannah River Site  
Citizens Advisory Board**

**Recommendation # 279  
Federal Facility Agreement Update Provided Annually**

**Background**—The Federal Facility Agreement (FFA) guides the cleanup of the Savannah River Site and appears to be working well, largely due to the cooperative spirit of the Federal Facility Agreement team from the Department of Energy (DOE), US Environmental Protection Agency (EPA), and the South Carolina Department of Health and Environmental Control (SCDHEC). One of the aspects of the FFA that insures the cleanup process stays on track is the annual revision of Appendix E, which is submitted to US EPA and SCDHEC for approval.

For many years, DOE staff has prepared and presented an update of Appendix E on an annual basis to the Facilities Disposition and Site Remediation Committee (FD&SR), whose chairperson sometimes requested that the presentation be repeated at a full Citizens Advisory Board (CAB) meeting. These presentations have tended to state changes in deadlines and milestones rather than the impact or lack of impact that revisions to Appendix E will have on the overall cleanup process and the timeline for such cleanup.

Furthermore, when areas have been added to the Appendix E, it has not been clear why such additions are necessary, how significant the contamination is, and the impact on the cleanup process or the budget of such additions. Finally, the impact of the National Historic Preservation Act on the cleanup activities or the timetable has not been discussed in any detail.

Most importantly, past presentations on the FFA have focused on revisions to Appendix E after it has been approved by the US EPA and the SCDHEC. As a result, the CAB has had no opportunity for input into the changes that DOE has proposed.

**Recommendations:** The Savannah River Site Citizens Advisory Board recommends that DOE:

- 1) Develop a chart, based on proposed revisions to Appendix E that shows only those revisions that are deemed to be important to the overall cleanup process that would be of interest to the public.
  - a. Changes in milestones or schedules need to be shown in such a way that it is easily apparent whether or not each proposed change negatively impacts the level of cleanup or the timeline of cleanup.
  - b. Reasons for proposed changes need to be explained fully so the public understands if changes are due to budget restraints, technical difficulties, technical advances, changes in priorities, or conflicts with other laws/regulations, such as the National Historic Preservation Act, etc.
  - c. If new areas are being proposed to be added to the cleanup schedule, the ramifications of such additions need to be explained so that the following are discernible to the public:
    - i. the seriousness of the contamination,
    - ii. why areas were not included previously, and
    - iii. the budget impact.
- 2) Present this information annually to the FD&SR Committee at its August meeting, which would allow the CAB to provide input before the revisions to Appendix E are submitted to the US EPA and SCDHEC for approval in November.

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Adopted September 27, 2011

Sponsored by the Facilities Disposition & Site Remediation Committee